

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001) 03 MDL No. 1570 (RCC)
_____) ECF Case

This document relates to:

C.A. No. 03-CV-9849 (RCC)
THOMAS E. BURNETT, SR., *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*

**DEFENDANT SOLIMAN H.S. AL-BUTHI'S
ANSWER TO THIRD AMENDED COMPLAINT**

Defendant Soliman H.S. Al-Buthi (D59) (“Al-Buthi”), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits his Answer to the *Burnett* Plaintiffs’ Third Amended Complaint (“Complaint”).

Introduction

Pages 199-220 of the Complaint set forth general allegations as to the nature of this case to which no response is required. To the extent that a response is required, Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in the Introduction, other than to deny that there is any basis for this action against him or that plaintiffs are entitled to any relief against him.

Jurisdiction and Venue

1. Mr. Al-Buthi denies that this court has subject matter jurisdiction over him under 28 U.S.C. §§ 1331 and 1367, 18 U.S.C. § 1330 (Alien Tort Claims Act), and 18 U.S.C. §§ 2334 and 2338 (Anti-Terrorism Act). Mr. Al-Buthi denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§

1330(a), 1332(a)(2), and 1605, because those provisions apply solely to actions against foreign states.

2. Mr. Al-Buthi denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7), because those provisions apply solely to actions against foreign states.
3. Mr. Al-Buthi denies that venue is proper under "28" [sic, 18] U.S.C. § 2334 (Anti-Terrorism Act). Mr. Al-Buthi denies that venue is proper under 28 U.S.C. §§ 1391(d) and 1391(f)(4), because those provisions apply solely to actions against foreign states.

Parties — Plaintiffs

4. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 4.

Factual Allegations Against Defendants

5. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 5.
6. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 6.
7. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 7.
8. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 8.

9. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 9.
10. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 10.
11. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 11.
12. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 12.
13. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 13.
14. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 14.
15. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 15.
16. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 16.
17. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 17.
18. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 18.
19. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 5.

20. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 20.
21. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 21.
22. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 22.
23. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 23.
24. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 24.
25. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 25.
26. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 26.
27. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 27.
28. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 28.
29. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 29.
30. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 30.

31. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 31.
32. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 32.
33. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 33.
34. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 34.
35. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 35.
36. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 36.
37. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 37.
38. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 38.
39. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 39.
40. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 40.
41. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 41.

42. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 42.
43. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 43.
44. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 44.
45. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 45.
46. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 46.
47. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 47.
48. Mr. Al-Buthi denies the allegations in paragraph 48 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 48.
49. Mr. Al-Buthi denies the allegations in paragraph 49 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 49.
50. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 50.
51. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 51.

52. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 52.
53. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 53.
54. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 54.
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56. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 56.
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58. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 58.
59. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 59.
60. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 60.
61. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 61.

62. Mr. Al-Buthi denies the allegations in paragraph 62 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 62.
63. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 63.
64. Mr. Al-Buthi denies the allegations in paragraph 64 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 64.
65. Mr. Al-Buthi denies the allegations in paragraph 65 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 65.
66. Mr. Al-Buthi denies the allegations in paragraph 66 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in or contemplated by reference in paragraph 66.
67. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 67.
68. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 68.
69. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 69.
70. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 70.

71. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 71.
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82. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 82.
83. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 83.
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85. Mr. Al-Buthi denies the allegations in paragraph 85 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 85.
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136. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 136.
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145. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 145.
146. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 146.

147. Mr. Al-Buthi denies the allegations in paragraph 147 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 147.

148. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 148.

149. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 149.

150. Mr. Al-Buthi denies the allegations in paragraph 150 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 150.

151. Mr. Al-Buthi denies the allegations in paragraph 151 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 151.

152. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 152.

153. Mr. Al-Buthi denies the allegations in paragraph 153 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 153.

154. Mr. Al-Buthi denies the allegations in paragraph 154 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 154.

155. Mr. Al-Buthi denies the allegations in paragraph 155 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 155.

156. Mr. Al-Buthi denies the allegations in paragraph 156 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 156.

157. Mr. Al-Buthi denies the allegations in paragraph 157 insofar as they refer to himself. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 157.

158. Mr. Al-Buthi denies the allegations in paragraph 158 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 158.

159. Mr. Al-Buthi denies the allegations in paragraph 159 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 159.

160. Mr. Al-Buthi denies the allegations in paragraph 160 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 160.

161. Mr. Al-Buthi denies the allegations in paragraph 161 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 161.

162. Mr. Al-Buthi denies the allegations in paragraph 162 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 162.

163. Mr. Al-Buthi denies the allegations in paragraph 163 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 163.

164. Mr. Al-Buthi denies the allegations in paragraph 164 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 164.

165. Mr. Al-Buthi denies the allegations in paragraph 165 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 165.

166. Mr. Al-Buthi denies the allegations in paragraph 166 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 166.

167. Mr. Al-Buthi denies the allegations in paragraph 167 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 167.

168. Mr. Al-Buthi denies the allegations in paragraph 168 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 168.

169. Mr. Al-Buthi denies the allegations in paragraph 169 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 169.

170. Mr. Al-Buthi denies the allegations in paragraph 170 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 170.

171. Mr. Al-Buthi denies the allegations in paragraph 171 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 171.

172. Mr. Al-Buthi denies the allegations in paragraph 172 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 172.

173. Mr. Al-Buthi admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of the Al Haramain Islamic Foundation, Inc. (U.S.A.). Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 173, to the extent an additional response is required.

174. Mr. Al-Buthi denies the allegations in paragraph 174 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 174, to the extent an additional response is required.

175. Mr. Al-Buthi denies the allegations in paragraph 175 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 175.

176. Mr. Al-Buthi denies the allegations in paragraph 176 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 176.

177. Mr. Al-Buthi denies the allegations in paragraph 177 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 177.

178. Mr. Al-Buthi denies the allegations in paragraph 178 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 178.

179. Mr. Al-Buthi denies the allegations in paragraph 179 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 179.

180. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 180.

181. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 181.

182. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 182.

183. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 183.
184. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 184.
185. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 185.
186. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 186.
187. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 187.
188. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 188.
189. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 189.
190. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 190.
191. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 191.
192. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 192.
193. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 193.

194. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 194.
195. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 195.
196. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 196.
197. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 197.
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215. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 215.

216. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 216.
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226. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 226.

227. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 227.
228. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 228.
229. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 229.
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238. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 238.
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258. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 258.
259. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 259.

260. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 260.
261. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 261.
262. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 262.
263. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 263.
264. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 264.
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271. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 271.
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282. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 282.
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352. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 352.
353. Mr. Al-Buthi denies the allegations in paragraph 353 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 353.
354. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 354.
355. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 355.
356. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 356.
357. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 357.

358. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 358.

359. Mr. Al-Buthi denies the allegations in paragraph 359 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 359.

360. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 360.

361. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 361.

362. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 362.

363. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 363.

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366. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 366.

367. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 367.

368. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 368.
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379. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 379.

380. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 380.

381. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 381.

382. Mr. Al-Buthi denies the allegations in paragraph 382 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 382.

383. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 383.

384. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 384.

385. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 385.

386. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 386.

387. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 387.

388. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 388.

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398. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 398.
399. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 399.

400. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 400.
401. Mr. Al-Buthi denies the allegations in paragraph 401 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 401.
402. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 402.
403. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 403.
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410. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 410.
411. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 411.
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416. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 416.
417. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 417.
418. Mr. Al-Buthi denies the allegations in paragraph 418 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 418.
419. Mr. Al-Buthi denies the allegations in paragraph 419 insofar as they refer to him.
Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 419.

420. Mr. Al-Buthi denies the allegations in paragraph 420 insofar as they refer to him.

Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 420.

421. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 421.

422. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 422.

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540. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 540.
541. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 541.
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550. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 550.

551. Mr. Al-Buthi denies the allegations in paragraph 551 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 551.

552. Mr. Al-Buthi denies the allegations in paragraph 552 insofar as they refer to him. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 552.

553. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 553.

554. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 554.

555. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 555.

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558. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 558.

559. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 559.

560. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 560.

561. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 561.
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563. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 563.
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566. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 566.
567. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 567.
568. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 568.
569. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 569.
570. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 570.
571. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 571.

572. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 572.
573. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 573.
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581. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 581.
582. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 582.

583. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 583.
584. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 584.
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596. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 596.
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598. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 598.
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602. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 602.
603. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 603.
604. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 604.

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619. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 619.
620. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 620.
621. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 621.
622. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 622.
623. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 623.
624. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 624.
625. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 625.
626. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 626.

627. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 627.
628. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 628.
629. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 629.
630. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 630.
631. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 631.
632. To the extent that allegations in paragraph 632 refer to Mr. Al-Buthi, he denies them. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 632.
633. To the extent that allegations in paragraph 633 refer to Mr. Al-Buthi, he denies them. Mr. Al-Buthi does not possess sufficient information to admit or deny all other allegations contained in paragraph 633.
634. Mr. Al-Buthi does not possess sufficient information to admit or deny the allegations contained in paragraph 634.

CLAIMS

Count One — Foreign Sovereign Immunities Act

635. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations

of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

636. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

637. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

638. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

639. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

640. Count One only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

Count Three — Anti-Terrorism Act

645. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
646. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
647. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
648. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
649. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
650. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
651. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

652. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Three). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Three against him, or that they are entitled to any relief in this action against him.

Count Four — Alien Tort Claims Act

653. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

654. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

655. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

656. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

657. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Four). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Four against him, or that they are entitled to any relief in this action against him.

Count Five — Wrongful Death

658. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
659. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
660. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
661. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
662. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
663. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

664. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Five). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Five against him, or that they are entitled to any relief in this action against him.

Count Seven — Survival

668. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

669. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

670. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Seven). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Seven against him, or that they are entitled to any relief in this action against him.

Count Eight — Intentional Infliction of Emotional Distress

671. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

672. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

673. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

674. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

675. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

676. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Eight). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Eight against him, or that they are entitled to any relief in this action against him.

Count Nine — Conspiracy

677. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

678. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

679. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

680. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

681. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

682. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Nine). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Nine against him, or that they are entitled to any relief in this action against him.

Count Ten — Aiding and Abetting

683. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

684. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

685. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

686. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

687. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

688. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Ten). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Ten against him, or that they are entitled to any relief in this action against him.

Count Fourteen — Punitive Damages

715. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

716. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

717. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Fourteen). Mr. Al-Buthi denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Fourteen against him, or that they are entitled to any relief in this action against him.

**Count Fifteen — Punitive Damages: Agencies and Instrumentalities
of the Foreign State Defendant**

718. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

719. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

720. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

721. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

722. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Al-Buthi is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Common Issues Requiring Consolidation

723. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against Mr. Al-Buthi for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of Mr. Al-Buthi's activities and plaintiffs' injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of Mr. Al-Buthi proximately caused any harm or damage to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

Mr. Al-Buthi's activities were not the proximate cause of any harm or damage to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SIXTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against Mr. Al-Buthi.

SEVENTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against Mr. Al-Buthi.

EIGHTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against Mr. Al-Buthi.

NINTH AFFIRMATIVE DEFENSE

(Insufficient Service of Process)

Plaintiffs have failed to serve Mr. Al-Buthi as required by the Federal Rules of Civil Procedure.

TENTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against Mr. Al-Buthi.

ELEVENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against Mr. Al-Buthi are barred, in whole or in part, by the applicable statute of limitation(s).

TWELFTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against Mr. Al-Buthi are barred because his activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of his activities in any way were intended to, or did harm, the plaintiffs in this action.

THIRTEENTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against Mr. Al-Buthi, for the same or similar claims, in the civil action styled Ashton, et al. v. Al-Qaeda Islamic Army, et al., No. 02-CV-6977 (RCC), and in other civil actions consolidated under In re Terrorist Attacks on Sept. 11, 2001, No. 03 MDL No. 1570 (RCC), pending in the United States District Court for the Southern District of New York.

FOURTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, Mr. Al-Buthi intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

Mr. Al-Buthi requests that the Plaintiffs' Third Amended Complaint be dismissed with prejudice as to him, and that the Court award attorney's fees and costs to Mr. Al-Buthi in defending against a case with no factual or legal basis against Mr. Al-Buthi, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/S/ Lynne Bernabei

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Attorneys for Defendant
Soliman H.S. Al-Buthi (D59)

Dated: August 20, 2004

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2004, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

Alan R. Kabat